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10 *Attorney for Movant Maryland Department*
11 *Of the Environment*

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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 IN RE: VOLKSWAGEN “CLEAN DIESEL”
17 MARKETING, SALES PRACTICES, AND
18 PRODUCTS LIABILITY LITIGATION

19 MDL No. 2672 CRB (JSC)

20 This Document Relates to:

21 **DECLARATION OF ROBERTA R.**
22 **JAMES IN SUPPORT REMOVING**
23 **MARYLAND FROM MDL NOTICE**
24 **LIST**

25 *Maryland Department of the Environment v.*
26 *Volkswagen Aktiengesellschaft et al.*, Case No.
27 3:16-cv-05090 (CRB)

28 The Honorable Charles R. Breyer

Hearing Date:
Hearing Time:

19 I, Roberta R. James, declare as follows:

20 1. I am an Assistant Attorney General in the office of Anthony G. Brown,
21 Attorney General of the State of Maryland, and an attorney for the Maryland Department
22 of the Environment (MDE) in this matter. I submit this declaration in support of
23 Maryland’s Request for Removal from receiving notices from MDL No. 2672 CRB.

24 2. Attached hereto as Exhibit A is a true and correct copy of this Court’s
25 Order, dated May 23, 2017, remanding the matter, *Maryland Department of the*
26 *Environment v. Volkswagen Aktiengesellschaft et al.*, Case No. 24-C-16004114 (Md. Cir.
27 Ct. Baltimore City), back to the Circuit Court for Baltimore City Maryland.

28 3. Attached hereto as Exhibit B is a true and correct copy of the entered

1 Consent Decree and Order, signed by Judge W. Michel Pierson, dated May 3, 2018, in
2 the matter *Maryland Department of the Environment v. Volkswagen Aktiengesellschaft et*
3 *al.*, Case No. 24-C-16004114 (Md. Cir. Ct. Baltimore City).

4 4. Attached hereto as Exhibit C is a true and correct copy of this Court's
5 letter to the Clerk of the Court for Baltimore City Circuit Court, dated May 24, 2017,
6 remanding the matter back to Maryland.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct.

9 So declared this 23nd day of April, 2024.

10
11 /s/ Roberta R. James

12 Roberta R. James